

COUNTY AGENCY: SUFFOLK COUNTY POLICE DEPARTMENT

LANGUAGE ACCESS COORDINATOR (LAC): D/Lt. Robert Donohue

LAC PHONE/E-MAIL: (631) 852-6109 Robert.Donohue@suffolkcountyny.gov

Note: Research continues to be done and information gathered. This document is subject to change.

I. PURPOSE

Pursuant to Suffolk County Executive Order No. 10-2012, the Suffolk County Police Department has developed the **Suffolk County Police Department Language Access Plan** (“Plan”) which sets forth the strategies to be implemented in an effort to ensure persons with Limited English Proficiency (LEP) have meaningful access to all Department services and programs.

II. POLICY

The mission of the Suffolk County Police Department is to provide and maintain a safe environment in which people can live and work. Every member of the Department acknowledges his or her obligation to provide professional services by rendering aid to those in need, providing an environment free from fear, bringing to justice those who violate the law and protecting all persons and property in accordance with legal and ethical standards.

The Department serves a diverse population with many residents whose primary language is not English and who have a limited ability to read, write, speak or understand English. Individuals with LEP may be capable of communicating through certain modes (e.g. speaking), but still have limited proficiency in others (e.g. reading or writing). The Department’s Plan will address these needs in the most effective and efficient manner in its effort to afford all residents of the Suffolk County Police District the same high level of police service. The Department will regularly assess the language needs of residents as well as the Department’s approach in addressing these needs and will update its Plan annually in accordance with Executive Order No. 10-2012.

A person’s use of the Police Department’s language services shall not be deemed by any member of this department as a basis for inquiring into immigration status. No member of this Department shall inquire about or disclose, an individual’s immigration status, unless such inquiry or disclosure is required by law.

This plan will be incorporated into the Department Rules and Procedures and will be made available to the public on the Department’s website. The plan will also be distributed to LEP community groups.

III. DEFINITIONS

A. **Bilingual** – is the ability to use two languages to a level of proficiency sufficient to participate effectively in a conversation on practical, social and professional topics, and possession of a broad vocabulary, moderate accent and the comprehension level required for a normal rate of speech.

- B. Department Authorized Interpreter (DAI) – a member of the Department, with a fluency in a language other than English, who is authorized to interpret for others.

IV. REFERENCES

- A. American Translators Association Code of Ethics and Professional Practice

V. RULES AND REGULATIONS

VI. PROCEDURES

A. Assessing the LEP Population and Language Needs

Members of the Suffolk County Police Department including but not limited to 911 Dispatchers, Police Officers and Investigators may come into contact with LEP individuals when answering 911 calls, responding to and investigating crimes, assisting members of the public over the phone and in informal encounters. The Department documents these contacts through the use of computer aided dispatch entries, incident reports, depositions and statements, as well as other forms and reports required by department protocol and by law.

The County has identified the following six most common languages which are spoken by individuals with limited English proficiency within Suffolk County: Spanish, Mandarin Chinese, Polish, Italian, Portuguese and Haitian Creole. The demand for interpretation services experienced by the Department in calendar year 2013 reflected a 90% need for Spanish, a 3.5% need for Mandarin Chinese, a 1.0% need for Haitian Creole and a 1.0% need for Polish.

To ensure all residents are able to access the same level of service, the Department will enhance and/or implement the following policies and procedures:

1. At the entry point or lobby of all public police buildings and facilities, including all Police Precincts, Police Headquarters, Court Liaison, Property Section, Impound Section, Marine Bureau Headquarters, Police Academy Bureau (West) and the Airport Operations Section signage shall be posted in the most commonly spoken languages stating that interpreters are available free of charge to LEP individuals who need to report a crime or for any other official business related to Police Department operations.
2. The Department has identified the following documents as Vital Documents. These documents will be included in an informational book, ***Your Suffolk County Police Department*** (Separate Document), which will be available in the above six languages and maintained at all public police buildings and facilities and on the Department website.
 - a. How to Obtain a Police Report (PDCS-8100)
 - b. Family Offense Assistance and Court Procedures (PDCS-7109)

- c. What to do When Stopped by the Police (PDCS-7148)
 - d. A Missing Person Is – How to Report a Person Missing
 - e. Special Needs / Silver Alert Program (PDCS-8060)
 - f. Crime Victim Information Report (PDCS-8105)
 - g. Compliment Complaint Information Report (PDCS-1300-1)
 - (1) The Compliment Complaint Information Report, PDCS – 1300-1, will be accepted by the Department when completed in languages other than English.
 - h. Mental Health Assistance Notification (PDCS-7146c)
- 3. The Department will maintain Language Identification Charts at all public police facilities and in all sector cars.
 - 4. In the case of illiteracy or languages for which written materials have not been translated, such forms and documents will be read to LEP individuals in their primary language by a Department Authorized Interpreter or through the Language Line Service.
 - 5. Links will be available on the Department website in the six languages above which, when clicked on, will provide information on how to access language assistance services as well as a PDF version of *Your Suffolk County Police Department*.

B. Services for Language Assistance

The Suffolk County Police Department will take all reasonable measures to provide timely, meaningful access to the services and programs of the Department regardless of the language spoken by persons seeking such service. Department personnel will provide free language assistance to all LEP individuals who are in need of or request such assistance. Department personnel will inform the public that all language assistance services are available free of charge. Members of the Department will adhere to the following procedures when securing interpretation services:

- 1. In accordance with County Executive direction, the Department will identify members who possess any level of fluency in a language other than English. These members will be evaluated by Civil Service to determine whether they meet the oral proficiency standards set by Civil Service. The Police Commissioner, or his designee, will authorize these members of the Department to serve as DAI. A current list of all DAI and the languages they speak will be maintained in the Communications Section Supervisor's office.
- 2. Members of the Department who are in need of interpretation services will attempt to identify the LEP individual's primary language, employing a *Language Identification Chart* if necessary, and will then request an appropriate DAI via the Communications Section Supervisor. If no DAI are available, the member of service will contact the Language Line Service.

- a. Exigent circumstances: Department personnel who must communicate with LEP individuals in dangerous or rapidly developing situations may temporarily use any available interpreter. Temporary interpreters may include:
 - i. Bilingual Department personnel;
 - ii. Bilingual bystanders. Members of the Department utilizing these types of temporary interpreters shall first consider the chosen interpreter's apparent proficiency in both the source and target languages, and shall also consider any apparent bias, personal interest, or confidentiality issues raised by the use of a particular temporary interpreter. Members of the Department utilizing these types of temporary interpreters are responsible for developing and asking all questions. Members shall also consider the degree to which the temporary interpreter appears to remain neutral, or appears to be inserting his or her own perspective or information into the communication.
- b. Documentation of use of temporary interpreters will be made in accordance with Rules and Procedures Chapter 26(5).
- c. Duration of the exigency. When the circumstances giving rise to the exigency have passed, members of the Department shall determine whether a continued need for interpretation services exists.
 - i. If no further interpretation is required, members shall review the content of the interpretation for accuracy and sufficiency.
 - ii. If the content provided by the temporary interpreter is incomplete, inaccurate or otherwise compromised, or if the need for interpretation services extends beyond the period of exigency, members of the Department shall utilize the DAI list, or the Language Line Service.
3. When correspondence is received by the Department in a language other than English, it will be translated into English. Once translated, if the correspondence would be considered a citizen complaint, it will be forwarded to the Commanding Officer of the Internal Affairs Bureau for investigation. The Department will respond to all correspondence in a timely manner.
4. The Department's *Compliment / Complaint Information Reports* that are in languages other than English will indicate interpretation services are available at Police facilities or over the phone.
5. All members of the Department, both sworn and civilian, have access to the Language Line service 24 hours a day, seven days a week. Language Line provides interpretation services in more than 200 different languages. Dual handset telephones for use in communicating via the Language Line interpreter service have been installed in the following locations.
 - a. Front desk of every precinct
 - b. Front desk at headquarters
 - c. Crime Section in every precinct

- d. Detective Squad in every precinct
- e. Airport Operations Section
- f. Central Records public window
- g. Domestic Violence Section
- h. Hate Crimes Section
- i. Homicide Section
- j. Internal Affairs Bureau
- k. Marine Bureau desk
- l. Marine Bureau – Fire Island (two phones)
- m. Pistol Licensing Bureau
- n. Police Academy Bureau
- o. Special Victims Section
- p. Special Patrol Bureau

Additionally, thirty seven sector cars within the Patrol Division are equipped with cell phones programmed to automatically dial the Language Line. These cell phones are deployed in the following patrol units:

First Precinct	102, 106, 108, 114, 117
Second Precinct	202, 203, 205, 206, 209, 217, 221
Third Precinct	302, 303, 310, 312, 316, 318, 321, 322, 323
Fourth Precinct	404, 406, 410, 417
Fifth Precinct	502, 509, 510, 512, 513, 515
Sixth Precinct	610, 613, 618, 619
Seventh Precinct	702, 708, 714

6. The county has contracted with Mill Neck Interpreter Service to obtain sign-language interpreter services for deaf and hearing-impaired persons. Sign language interpreters will respond to incident locations or to police facilities to assist with communicating. Department members can utilize this service 24 hours-a-day, seven-days-a-week. The Police Department is not required to have any specific equipment available to utilize this service. Members must first call Mill Neck at 516-512-6222 and follow the voice prompts. Officers must then log onto their website at: <http://www.millneck.org/services/interpreting/interpreting.html> and then [complete the request for services on the website.](#)
7. Members using a DAI or any of the available interpretation services will complete the Interpretation Tracking Data Form, PDCS 7042a with all pertinent information and submit same for entry into the Department's tracking database.
8. The Department currently maintains 35 forms which are translated into Spanish. Many of these forms are incident-specific and are not vital or essential public documents but investigatory documents. Members of the Department shall request a DAI and document an LEP individual's responses in English.

C. Training

The Department will conduct annual training for all members of the Department on LEP policies and procedures. This training will be conducted for recruit and in-service personnel and will include classroom instruction as well as training videos and training bulletins.

1. The Department will continue to provide 20 hours of Spanish Culture and Language training in its Recruit Training Program which will include LEP policies and procedures.
2. In-service members, both sworn and civilian will receive annual training in the following:
 - a. How to identify the language assistance needs of an LEP individual during an in – person or telephone interaction
 - b. How to access Department Authorized Interpreters, Language Line interpreters and the use of interpreters during exigent circumstances.
 - c. How to work with interpreters and assess interpreter quality.
 - d. How to account for cultural diversity and language barriers in policing.
 - e. Basic phrases, terms and commands in Spanish.
 - f. Bias-Free Policing, Cultural Sensitivity, Hate Crimes/Incidents, Language Access Plan and Limited English Proficiency.
3. Sworn personnel will be issued a Spanish language guide memo book insert (PDCS 7041) to assist them in police related situations involving LEP individuals.
4. Department members are also required to complete the following annual Decentralized Individualized In-Service Training (D.I.I.T.):
 - a. Simple Spanish Commands (DIIT) 27 minutes
 - b. Language Line Services (DIIT) 3:35 minutes

D. Monitoring and Compliance

The Language Access Coordinator (LAC) will be responsible for coordinating and implementing the Department's Language Access Plan. Such duties will include but not be limited to:

1. Assessing demographic data, reviewing interpreter utilization data from contracted language access services as well as data from the Interpretation Tracking Data Form, PDCS – 7042 to determine the changing needs of the community. The Department will be guided by the information collected to determine what changes and modifications should be made, what documents are designated as vital and the languages into which they should be translated. Examination of all available data and determination of the six most common non-English languages encountered within the Police District will guide the Department in assessing the need to translate Department documents into additional languages and/or the need for additional interpreter services.

2. Consulting with community-based organizations annually in order to determine if there are additional languages into which vital documents should be translated.
3. Reviewing new documents created by the Department and assessing the need for them to be translated into languages other than English.
4. Maintaining the Department's DAI list as well as coordinating with the Department of Civil Service to ensure members of the Department on these lists are certified and recertified as appropriate.
 - a. The Department will implement a method consistent with the standards of Suffolk County Civil Service to verify levels of proficiency employees possess in languages other than English.
 - b. The Department will establish a monitoring system to ensure authorized interpreters maintain a level of ethical standards.
5. The Department's Internal Affairs Bureau will review and respond to all language access complaints. The Bureau will also review all complaints received by the Department in a language other than English to determine if any underlying systemic issues exist.
 - a. The Internal Affairs Bureau will periodically request a list of 9-1-1 calls which the Communications Section tied into Language Line. Investigators will randomly select a predetermined number of calls to audit in order to ensure complainants were satisfied with the police service provided.
6. If a member of this Department believes a DAI is engaging in unethical behavior, to include adding or omitting words, phrases or context, which denies meaningful access to an LEP individual, such member will immediately report such information to their immediate supervisor in an Internal Correspondence, PDCS 2042. Such correspondence will be forwarded through the immediate supervisor's chain of command to the Office of the Police Commissioner where a determination will be made reference such member's designation as a DAI.
7. The Department's Language Access Coordinator will represent the Department in its partnership with Latino community leaders as well as leaders from other communities with significant LEP populations to ensure effective implementation of the Department's Language Access Plan. The Community Response Bureau will address community concerns about the plan as well as offer ideas and strategies for ensuring language access. The Community Response Bureau will conduct reviews to evaluate the plan's effectiveness, accuracy and quality of services.
 - a. Community Response Bureau will conduct a semi-annual survey of Latino and other minority advocacy groups to gauge the effectiveness of the Department's Language Access Plan as well as any other Department programs and initiatives.

- b. Community Response Bureau will analyze the results of each survey and implement measures, if necessary, to improve the plan.
- c. A report detailing the survey, its results and actions taken by the Department will be published on the Department's website and in other relevant and appropriate media.

VII. ACCREDITATION STANDARD REFERENCES

- A. CALEA
- B. NYSLEAP

VIII. INDEX

N/A

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